

March 19, 2008



RE: USDA/AMS proposal to add a 5% shatter allowance

To Whom It May Concern:

I am writing to the Federal Register notice of February 26, 2008 filed by the Agricultural Marketing Service of the U.S. Department of Agriculture to support the proposal to modify the current U.S. Standards for Grades of Table Grapes to provide a 5 percent allowance for shattered berries in consumer containers.

Our table grape quality continues to meet consumer demand and we must recognize that today's packaging methods help provide for the realization of consumer expectation. Without the allowance for shatter, high quality product is disregarded because of standardization that has not caught up with current methods and practices.

In the old days, retailers sold loose bunch of grapes, principally by the pound. Therefore grapes that fell off the bunch, either in the lug from California or on the retail display, were typically waste and not sold. Today, if a grape falls off the bunch it remains in the bag or clamshell and is sold to the consumer. This translates into additional revenue at retail and it is reasonable for growers to look for a share of this new income source. The industry cannot succeed if the producer cannot profitably produce and so our commitment to a sustainable industry starts with making sure growers get a fair return.

While we do not and will not advocate for any change to negatively affect grading standards, we believe this proposed change will only serve to strengthen and enhance governance of table grape standards. Grape growers have no economic interest in competitively putting any one customer sector at a disadvantage. Just as building a sustainable industry involves looking to make sure growers can survive.

I respectfully ask for your consideration. If you would like to discuss any of these points please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in dark ink, appearing to read "Clint Young". The signature is fluid and cursive, with a large loop at the end.

Clint Young
Pitts Farms

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